



**Amber S. Finch**  
Direct Phone: +1 213 457 8046  
Email: [afinch@reedsmith.com](mailto:afinch@reedsmith.com)

Reed Smith LLP  
355 South Grand Avenue  
Suite 2900  
Los Angeles, CA 90071-1514  
+1 213 457 8000  
Fax +1 213 457 8080  
[reedsmith.com](http://reedsmith.com)

September 28, 2020

**RE: *Roc Nation, LLC v. HCC International Insurance Company, PLC*; Case No.: 1:19-cv-00554**

Dear Judge Engelmayer:

This firm is legal counsel to Plaintiff Roc Nation, LLC ("Roc Nation"). We request permission, pursuant to Section 4(B) of Your Honor's Individual Rules and Practices, to file confidential, redacted portions of Roc Nation's Reply in support of its Partial Motion for Summary Judgment (the "Reply") under seal. Roc Nation's Reply contains confidential financial and proprietary information that it intends to protect pursuant to the Protective Order in this case. Therefore, Roc Nation asks that this Court grant its request to file the Reply under seal.

The Stipulated Confidentiality Agreement and Protective Order in this case [ECF No. 43] (the "Protective Order") allows counsel to designate deposition testimony and documents as Confidential under Section 4. The Reply cites and relies upon deposition transcripts and documents that were marked Confidential by the respective parties. Thus, pursuant to the Protective Order, Roc Nation has an obligation under the Protective Order to seal that information.

The issues involved in the Reply contain sensitive discussions of the business operations and financial information of Roc Nation. As discussed more fully in the Reply, Roc Nation brought this case to recover policy benefits on an insurance policy purchased from HCC. Part of this Reply seeks to resolve which parts, if any, of this financial information will be relevant to obtaining the policy benefit. Thus, consistent with the Protective Order, Roc Nation has good cause to file this confidential information under seal.

In an attempt to keep the sealing request as narrow as possible, Roc Nation seeks permission to file a redacted version of the Reply in public view, with the unredacted version filed under seal. These redactions remove the confidential financial and proprietary information from the Reply such that the pertinent parts can be filed publicly.

Good cause exists for granting this request. The request is submitted under the terms and for the reasons set forth the Protective Order, and the parties understood that their confidentiality designations would apply when they were exchanging information in order to avoid objections preventing the disclosure of material that would be relevant in discovery and for settlement discussions. Furthermore, and as stated above, Roc Nation has attempted to narrow this request to the extent possible.


Thank you for your time and attention to this matter.

Very truly yours,  
/s/ Amber Finch  
Amber S. Finch

*Attorneys for Roc Nation, LLC*

Granted.

SO ORDERED.

  
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PAUL A. ENGELMAYER  
United States District Judge

September 29, 2020